



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105-3901

July 16, 2012

Naval Facilities Engineering Command, Pacific Division
Attention: EV21, MV-22/H-1 EIS Project Manager
258 Makalapa Drive, Suite 100
Pearl Harbor, HI 96860-3134

Subject: Final Environmental Impact Statement for the Basing of MV-22 and H-1 Aircraft in Support of III MEF Elements in Hawaii, (CEQ # 20120180)

The U.S. Environmental Protection Agency (EPA) is providing comments on the Final Environmental Impact Statement (FEIS) for the Basing of MV-22 and H-1 Aircraft in Support of III MEF Elements in Hawaii. Our comments are provided pursuant to the National Environmental Policy Act (NEPA), Council on Environmental Quality regulations (40 CFR Parts 1500-1508), and our NEPA review authority under Section 309 of the Clean Air Act.

EPA reviewed the Draft Environmental Impact Statement (DEIS) for Basing of MV-22 and H-1 Aircraft in Support of III MEF Elements in Hawaii and provided comments on December 22, 2011. We rated the document EC-2, Environmental Concerns – Insufficient Information based on our concerns about greenhouse gas emissions, water resources, air quality, noise and solid waste.

We appreciate the changes made in the FEIS that are responsive to our comments, such as: the discussion of net-zero energy use for new buildings; the estimation of construction and non-aircraft operational pollutant emissions, including greenhouse gas emissions; the expected 75% recycle/salvage rate for construction and demolition waste, based on the preliminary design; and a commitment to implement Low Impact Design elements discussed in the DEIS. We were also pleased to learn that Marine Corps Base Hawaii Kaneohe Bay "is a candidate for becoming a net-zero base (producing more energy than it consumes)" (p. 5-22).

Since receiving the FEIS, EPA has received a number of letters and email messages from community members, expressing concerns about the noise impacts of the proposed action. We also noted the large number of noise comments in the FEIS. We recognize that the residential noise exposure is projected to be below the 65 Day-Night Average Sound Level threshold, which is widely considered compatible with residential use. We appreciate the consideration of a lower screening level (60 dB school-day equivalent sound level) for school noise exposure. We encourage MCB Hawaii Kaneohe Bay to use the noise concerns as a starting point to further engage the community. We recommend consideration of noise monitoring to validate the accuracy of baseline modeling, operational and physical measures that could be incorporated at the base to further reduce noise, and possible attenuation measures for residents and other affected organizations.

We appreciate the opportunity to review this FEIS. We encourage the Navy to discuss goals for energy conservation and generation, water conservation, and waste diversion in its Record of Decision, and, where appropriate, to commit to implementing these through contract construction specifications.

When the Record of Decision has been signed, please send one hard copy and one electronic copy to the address above (mail code: CED-2). If you have questions, please contact me at (415) 972-3521 or Tom Kelly of my staff at kelly.thomasp@epa.gov or (415) 972-3856.

Sincerely,



Kathleen Martyn Goforth, Manager
Environmental Review Office (CED-2)

cc: Colonel Brian P. Annichiarico, Marine Corps Base Hawaii